

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LESLIE DICK WORLDWIDE, LTD. AND
LESLIE DICK,

Plaintiffs,

-against-

GEORGE SOROS, SOROS FUND
MANAGEMENT LLC, SFM
MANAGEMENT, LLC, CONSECO, INC.,
VORNADO REALTY TRUST, GERMAN
AMERICAN CAPITAL CORP., DEUTSCHE
BANK, AG., EASTDIL SECURED, LLC,
HARRY MACKLOWE, FIG, LLC,
CERBERUS CAPITAL MANAGEMENT,
LP, LAZARD FRÈRES & CO. LLC,
KIRKLAND & ELLIS, LLP, FRIED,
FRANK, HARRIS, SHRIVER & JACOBSON
LLP, CARMEL FIFTH, LLC, 767
MANAGER, LLC, DONALD J. TRUMP
AND JOHN DOES "1" THROUGH "10,"

Defendants.

Hon. Barbara S. Jones

No.: 08 CV. 7900 (BSJ) (THK)

ECF Case

DECLARATION OF KENNETH E. LEE
IN SUPPORT OF LAZARD FRÈRES & CO. LLC'S MOTION TO DISMISS

I, Kenneth E. Lee, Esq., declare:

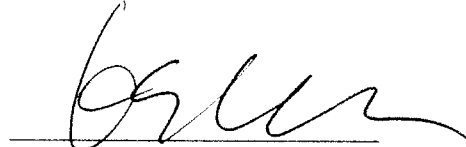
1. I am a member of the law firm Hughes Hubbard & Reed LLP, attorneys for Lazard Frères & Co. LLC ("Lazard") in the above-captioned matter. I submit this declaration in support of Lazard's Motion to Dismiss.

2. Attached hereto as Exhibit A is a true and correct copy of the order, dated January 14, 2003, from the Bankruptcy Court for the Northern District of Illinois, Eastern Division,

authorizing the employment and retention of Lazard as investment bank for Consecro, Inc. and its affiliated debtors during their Chapter 11 reorganization.

3. Attached hereto as Exhibit B is a true and correct copy of the order, dated June 4, 2004, from the Bankruptcy Court for the Northern District of Illinois, Eastern Division, approving Lazard's final application for allowance of compensation and reimbursement of expenses incurred between December 18, 2002 and September 9, 2003.

Pursuant to 28 U.S.C. § 1748, I declare under penalty of perjury on this 22nd day of December, 2008, that the foregoing is true and correct to the best of my knowledge.


Kenneth E. Lee